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AMENDMENTS TO THE CLAIMS

Claims 1-7 (Cancelled).

8. (Currently Amended) A device formed in a semiconductor material of a first conductivity type, the semiconductor material having a surface, the device comprising:

- a first well of a second conductivity type formed in the semiconductor material, the first well having a dopant concentration;

- a first contact region of the first conductivity type formed in the first well;

- a second contact region of the second conductivity type formed in the first well, the second contact region being electrically connected to the first contact region to have a same potential;

- a first trigger region of the second conductivity type formed in the first well, the first trigger region being spaced apart from the first and second contact regions;

- a second well of the second conductivity type formed in the semiconductor material, the second well being spaced apart from the first well by a gap and having a dopant concentration;

- a third contact region of the first conductivity type formed in the second well;

- a fourth contact region of the second conductivity type formed in the second well, the fourth contact region being electrically connected to the third contact region to have a same potential;

- a second trigger region of the second conductivity type formed in the second well, the second trigger region being spaced apart from the third and fourth contact regions, the first trigger region being positioned such that no other region having the second conductivity type lies between the first trigger region and the second trigger region;

- a first contact connected to the first contact region, the first contact having a top surface;

a second contact connected to the third contact region, the second contact having a top surface; and

a device region that ~~overlies the semiconductor material between the first and second trigger regions, the device region having a top surface that lies below and contacts a plane that contacts the top surfaces of the first and second contacts~~ extends from a first horizontal plane to a second horizontal plane, and from a first vertical plane to a second vertical plane, the first horizontal plane lying on the surface of the semiconductor material, the second horizontal plane contacting the top surfaces of the first and second contacts, the first vertical plane contacting the surface of the semiconductor material between the first trigger region and the first contact region, the second vertical plane contacting the surface of the semiconductor material between the second trigger region and the third contact region, the device region being totally free of a conductive material.

9. (Previously Added) The device of claim 8 wherein the first trigger region adjoins the semiconductor material; and the second trigger region adjoins the semiconductor material.

10. (Previously Added) The device of claim 9 wherein the first and second trigger regions are formed on opposite sides of the gap.

11. (Previously Added) The device of claim 10 wherein the first trigger region has a dopant concentration greater than the dopant concentration of the first well; and the second trigger region has a dopant concentration greater than the dopant concentration of the second well.

12. (Previously Added) The device of claim 8 wherein

the first trigger region has a dopant concentration greater than the dopant concentration of the first well; and

the second trigger region has a dopant concentration greater than the dopant concentration of the second well.

13. (Previously Amended) The device of claim 8 wherein during a first ESD event, a first potential on the first conductive structure is greater than a second potential on the second conductive structure.

14. (Previously Amended) The device of claim 13 wherein during a second ESD event, a third potential on the second conductive structure is greater than a fourth potential on the first conductive structure.

15. (Previously Added) The device of claim 8 wherein  
the semiconductor material has a top surface;  
the first well has a side surface that contacts the top surface, and a bottom surface that contacts the side surface; and  
the first trigger region is spaced apart from the bottom surface.

16. (Currently Amended) A device formed in a semiconductor material of a first conductivity type, the semiconductor material having a surface, the device comprising:

a first well of a second conductivity type formed in the semiconductor material, the first well having a dopant concentration;

a second well of the second conductivity type formed in the semiconductor material, the second well having a dopant concentration and being spaced apart from the first well;

a gap region of the semiconductor material located only between the first and second wells, the gap region contacting the surface;

a first contact region of the first conductivity type formed in the first well;  
a second contact region of the second conductivity type formed in the first well, the second contact region being electrically connected to the first contact region to have a same potential;  
a first trigger region of the second conductivity type formed in the first well, the first trigger region being spaced apart from the first and second contact regions and contacting the gap;  
a third contact region of the first conductivity type formed in the second well;  
a fourth contact region of the second conductivity type formed in the second well, the fourth contact region being electrically connected to the third contact region to have a same potential;  
a second trigger region of the second conductivity type formed in the second well, the second trigger region being spaced apart from the third and fourth contact regions and contacting the gap; and  
a device region that overlies and contacts the gap region, the device region being free of a gate, and not lying below a gate.

17. (Previously Added) The device of claim 16 wherein the first and second trigger regions are formed on opposite sides of the gap.

18. (Previously Added) The device of claim 16 wherein  
the first trigger region has a dopant concentration greater than the dopant concentration of the first well; and  
the second trigger region has a dopant concentration greater than the dopant concentration of the second well.

19. (Previously Amended) The device of claim 16 wherein no other region having the second conductivity type and a dopant concentration greater than the first well lies between the first trigger region and the second trigger region.

20. (Currently Amended) The device of claim 16 wherein the first trigger region is not directly electrically connected to the third contact region ~~so that the first trigger region and the third contact region have a same potential~~, and the second trigger region is not directly electrically connected to the first contact region ~~so that the second trigger region and the first contact region have an equal potential~~.

21. (Previously Added) The device of claim 8 wherein no other region having the second conductivity type and a dopant concentration greater than the first well lies between the first trigger region and the second trigger region.